

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

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UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER BRENNER COOK,
JONATHAN ALLEN FROST, and
JACKSON MATTHEW SAWALL,

Defendants.

CASE NO.

JUDGE

INFORMATION

18 U.S.C. § 2339A(a)

FORFEITURE ALLEGATIONS

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION

At all times relevant to this Information:

1. Defendant **CHRISTOPHER BRENNER COOK** ("COOK") resided primarily in Columbus, Ohio, within the Southern District of Ohio.
2. Defendant **JONATHAN ALLEN FROST** ("FROST") resided in both West Lafayette, Indiana and Katy, Texas.
3. Defendant **JACKSON MATTHEW SAWALL** ("SAWALL") resided in Oshkosh, Wisconsin.

COUNT 1

(Conspiracy to Provide Material Support to Terrorists)

4. The factual allegations contained in Paragraphs 1 through 3 of the Introduction Section of this Information are re-alleged and fully incorporated by reference herein.

5. From at least October 2019 and continuing until at least March 2020, in the Southern District of Ohio, and elsewhere, the defendants, **CHRISTOPHER BRENNER COOK, JONATHAN ALLEN FROST, and JACKSON MATTHEW SAWALL** did knowingly conspire and agree with each other to provide material support and resources, to wit, training, weapons, explosives and personnel, knowing and intending they were to be used in preparation for and in carrying out, a violation of Title 18, United States Code, Section 1366(a), destruction of an energy facility.

In violation of 18 U.S.C. § 2339A(a).

FORFEITURE A

6. The allegations of this Information are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America, pursuant to 18 U.S.C. § 924(d)(1) and 18 U.S.C. § 981(a)(1)(G), as incorporated by 28 U.S.C. § 2461(c).

7. Upon conviction of the offense alleged in the Information, the defendant, **CHRISTOPHER BRENNER COOK**, shall forfeit to the United States all firearms and ammunition involved in or used in the offense of 18 U.S.C. § 2339A(a) alleged in the Information, and all assets acquired or maintained with the intent and for the purpose of supporting, planning, conducting, or concealing any act in violation of 18 U.S.C. § 2339A, and all assets derived from, involved in, or used or intended to be used to commit any such violation, including, but not limited to the following property seized during the investigation in this case:

- a. A black Armalite Platform Carbine firearm bearing no Serial Number;
- b. An IKEA brand box containing 2 face masks, a Balaclava, and a disassembled AR15 firearm kit bearing no Make, Model, or Serial Number; and

- c. Assorted ammunition, including, but not limited to:
- Approximately 3 Remington 12-gauge shotgun shells;
 - Approximately 50 rounds of 9mm Luger ammunition;
 - Approximately 84 rounds of Tulammo brand 7.62 X 39mm ammunition;
 - Approximately 2 black Duramag 7.62 X 39mm magazines; and
 - Approximately 6 Tulammo brand 7.62 X 39mm shell casings.

Forfeiture pursuant to 18 U.S.C. § 924(d)(1) and 18 U.S.C. § 981(a)(1)(G), as incorporated by 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE B

8. The allegations of this Information are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America, pursuant to 18 U.S.C. § 924(d)(1) and 18 U.S.C. § 981(a)(1)(G), as incorporated by 28 U.S.C. § 2461(c).

9. Upon conviction of the offense alleged in the Information, the defendant, **JONATHAN ALLEN FROST**, shall forfeit to the United States all firearms and ammunition involved in or used in the offense of 18 U.S.C. § 2339A(a) alleged in the Information, and all assets acquired or maintained with the intent and for the purpose of supporting, planning, conducting, or concealing any act in violation of 18 U.S.C. § 2339A, and all assets derived from, involved in, or used or intended to be used to commit any such violation, including, but not limited to the following property seized during the investigation in this case:

- a. A black Armalite Platform Carbine firearm bearing no Serial Number;
- b. Assorted ammunition, including, but not limited to:
- Approximately 50 rounds of 9mm Luger ammunition;
 - Approximately 84 rounds of Tulammo brand 7.62 X 39mm ammunition;
 - Approximately 2 black Duramag 7.62 X 39mm magazines; and

- Approximately 6 Tulammo brand 7.62 X 39mm shell casings.
- c. A Smith and Wesson 9 mm pistol, SN: 42490;
- d. A Rugar Mark IV, 9 mm pistol, SN: S00076647;
- e. An AR Pistol with no identifiable Serial Number;
- f. Approximately 13 rounds of assorted ammunition and 2 empty magazines;
- g. Two grenade shells;
- h. A Black Silencer, bearing no identifying numbers;
- i. A Silver Silencer, bearing no identifying numbers;
- j. A Flash adapter;
- k. A Recoil spring;
- l. A Buffer weight;
- m. A magazine release;
- n. Three incomplete suppressers bearing no identifying numbers;
- o. A jig;
- p. A bag containing a glue gun, glue sticks, twine, and a torque compressor;
- q. Rubbermaid cone paper cups;
- r. A funnel;
- s. Sandpaper;
- t. A Proctor Silex portable burner;
- u. 2 Wooden Sticks;
- v. Pipes, including, not limited to: 2 plastic and 4 PVC;
- w. A pot with residue;
- x. A black threaded pipe piece;
- y. Mortar and pestle;
- z. Magnesium strips;
- aa. Assorted batteries and wires;
- bb. A metal device inside a tissue;
- cc. Assorted black, gray, white, yellow, and red powdery, unknown substances;
- dd. A Benfei USB, including its contents;
- ee. A Thinkpad Laptop, bearing identifying number 64D4DA163AFB4GR, including its contents;

- ff. A black Samsung cellular telephone, IMEI: 35531073599766, including its contents;
- gg. A Crucial hard drive, SN: 1609FO17D421, including its contents;
- hh. A Toshiba hard drive, SN: 43NX1VZNSNR7, including its contents;
- ii. A My Passport Ultra Drive hard drive, SN: WYC1A34E0691, including its contents; and
- jj. A Seagate hard drive, SN: Z1ESLE8H, including its contents.

Forfeiture pursuant to 18 U.S.C. § 924(d)(1) and 18 U.S.C. § 981(a)(1)(G), as incorporated by 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

**KENNETH L. PARKER
UNITED STATES ATTORNEY**



**JESSICA W. KNIGHT (0086615)
Assistant United States Attorney
JUSTIN SHER (DC 974235)
Trial Attorney**